

January 7, 2011

Ms. Sharon Fang, P.E.
Remedial Project Manager (3HS21)
U.S. EPA Region III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

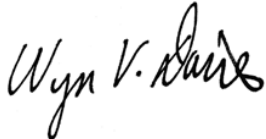
Re: Metal Bank Cottman Avenue NPL Site
Monthly Report due January 10, 2011
Reporting Period: December 1 through December 31, 2010

Dear Ms. Fang:

As provided in Paragraph 31 of the Utility Consent Decree, and on behalf of the Cottman Avenue PRP Group, Malcolm Pirnie as the Supervising Contractor is submitting to USEPA three copies of a written monthly progress report. Copies of the monthly progress reports are attached to this letter.

Please contact the Designated Project Coordinator, Dr. John Dobi (973.430.8036) or me (610.360.4895) if you need additional information regarding this submission.

Very truly yours,
MALCOLM PIRNIE, INC.



Wyn V. Davies, CIH
Principal Environmental Remediation Specialist

Cc: Cottman Avenue PRP Group
Steering and Technical Committees
Joseph Vitale, P.E.
Raymond E. Lees, P.E., CHMM
Dan J. Jordanger, Esquire

Enclosures
3809012

Project Name: Metal Bank NPL Site	For the Month: December 2010	
Project Location: Philadelphia, PA	Report Number: 57	Dated: January 07, 2011
























Name: Wyn Davies (ARCADIS)	Title: Project Manager
Telephone No.: (610) 360-4895	Telefax No.: (610) 768-5817
Reporting Period: December 1 through December 31, 2010	
(a) Describe the actions which have been taken toward achieving compliance with the Consent Decree during the previous month:	
<p>Remedial action monitoring continued throughout the month of December 2010. Activities included the following:</p> <ul style="list-style-type: none"> • Performed a replanting of cover crop native grasses over the entire upland soil cover to resolve EPA/BTAG concerns • Performed the LTM required survey of the upland cap topography, the marine mattress locations and near shore bathymetry • Prepared the draft second quarterly groundwater tables as data is received from the laboratory (some data still outstanding) • Conducted the monitoring of the sheet pile wall verticality • Enhanced/Maintained soil erosion & sedimentation control aspects • Provided access to the site for the US EPA to monitor the work related to the LTM 	
(b) Include a summary of all results of sampling and tests and all other data received or generated by Settling Third-Party Defendants or their contractors or agents in the previous month:	
None	
(c) Identify all work plans and other deliverables required by the Consent Decree completed and submitted during the previous month:	
<ul style="list-style-type: none"> • Cottman Ave PRP Group to EPA – The Group provided a review of the installation and a photolog to the EPA regarding the reseeding of the cover crop to enhance the revegetation. (12/09/10) • Cottman Ave PRP Group to EPA – The Group provided certified drawings to the EPA lawyer regarding the “as built” condition of the upland cap in response to the Owner’s request to the EPA. (12/10/10) • EPA to Cottman Ave PRP Group – The EPA provided an email response to the Group regarding the proposed performance of the caged worm study schedule and other long term monitoring activities requiring adjustment in the overall schedule for the LTM activities presented in the November Monthly Report. (12/13/10) • Cottman Ave PRP Group to EPA – The Group provided a response to the EPA regarding the correction of the dates when the caged worm study is to be performed and inclusion 	









Project Name: Metal Bank NPL Site	For the Month: December 2010	
Project Location: Philadelphia, PA	Report Number: 57	Dated: January 07, 2011

<p>of all LTM commitments. (12/15/10)</p> <ul style="list-style-type: none"> • Cottman Ave PRP Group to EPA – The Group provided a revised November Monthly Report LTM Schedule to the EPA regarding the correction of the dates when the caged worm study is to be performed and inclusion of all LTM commitments. (12/15/10) • EPA to Cottman Ave PRP Group – The EPA provided the Group a distribution list for the validation data report for the first quarterly groundwater sampling event. (12/16/10) • Cottman Ave PRP Group to EPA – The Group provided notice to the EPA regarding the implementation of the third round of quarterly groundwater monitoring to be performed the week of January 10th 2011. (12/16/10) • Cottman Ave PRP Group to EPA – The Group submitted the validation data report for the first quarterly groundwater sampling event to the EPA. (12/16/10) • EPA to Cottman Ave PRP Group – The EPA provided email response to the Group regarding the address for the DRBC representative and the need of an additional data disk for the EPA's use. (12/20/10)
<p>(d) Describe all actions, including, but not limited to, data collection and implementation of work plans, which are scheduled for the next month and provide other information relating to the progress of construction, including, but not limited to, critical path diagrams, Gantt charts, and Pert charts:</p>
<p>The current month look-ahead schedule for LTM O&M is attached.</p> <p>The PRP Group will continue monitoring the post construction activities including:</p> <ul style="list-style-type: none"> • Perform the THIRD Quarterly event – comprehensive groundwater monitoring round • Manage the data validation from the second round of groundwater monitoring • Summarize the SECOND Quarterly groundwater event's data • Perform the associated modifications to the QAPP, FSP, and LTM to include the Fish Study activities • Perform sheet pile wall monitoring • Monitor the LNAPL Trench Sumps for free product • Maintain the soil & erosion aspects • Continue monitoring of site for HSE compliance
<p>(e) Include information regarding percentage of completion, unresolved delays encountered or anticipated that may affect the future schedule for implementation of the Work, and a description of efforts made to mitigate those delays or anticipated delays:</p>
<ul style="list-style-type: none"> • All LTM O&M commitments are on schedule
<p>(f) Include any modifications to the work plans or other schedules that Settling Third-Party Defendants have proposed to EPA or that have been approved by EPA:</p>
<ul style="list-style-type: none"> • none

Project Name: Metal Bank NPL Site	For the Month: December 2010	
Project Location: Philadelphia, PA	Report Number: 57	Dated: January 07, 2011

(g) Describe all activities undertaken in support of the Community Relations Plan during the previous month and those to be undertaken in the next month:
<ul style="list-style-type: none"> The Group will coordinate with EPA on any community outreach endeavors on an as needed basis through the post construction period.

ID	Task Name	Duration	Start	Finish	January						February	
					12/26	1/2	1/9	1/16	1/23	1/30	2/6	2/13
1	 Submittal of Engineer Certification Report	1 day	Fri 5/28/10	Fri 5/28/10								
2	 Submittal of Updates to LTM - Fsh Study QAPP, FSP anf LTM Mods	1 day	Fri 1/7/11	Fri 1/7/11								
3	Commencement of LTM	1129 days	Thu 7/1/10	Tue 10/28/14								
4	 Commencement of LTM	1 day	Thu 7/1/10	Thu 7/1/10								
5	 Groundwater Quarterly Monitoring	399 days	Mon 1/10/11	Thu 7/19/12								
14	 Groundwater Monitoring Annual	268 days	Tue 1/8/13	Thu 1/16/14								
17	 Caged Worm Studies	262 days	Fri 7/1/11	Mon 7/2/12								
20	 Building 7 Assessment and Repair (as Needed)	787 days	Wed 5/4/11	Thu 5/8/14								
25	 Sheet Pile Wall Monitoring	106 days	Tue 11/30/10	Tue 4/26/11								
32	 Sheet Pile Monitoring Quarterly	326 days	Tue 5/31/11	Tue 8/28/12								
39	 LTM Quarterly Inspections and LNAPL Monitoring	981 days	Tue 1/25/11	Tue 10/28/14								
56	 Upland Surveying and Bathymetry	786 days	Mon 7/4/11	Mon 7/7/14								
61	 Diver Assisted Marine Mattress Location Assessment	783 days	Wed 7/6/11	Fri 7/4/14								
66	 Landfill Mowing	787 days	Wed 6/1/11	Thu 6/5/14								
71	 Performance of Fish Study	61 days	Mon 6/6/11	Mon 8/29/11								
72	 Invasive Species Herbicide Treatment (Emergence)- Milnor St.	2 days	Fri 7/8/11	Mon 7/11/11								
73	 Invasive Species (Knot Weed) Treatment along Delaware River Bank (Emergence)	3 days	Tue 7/5/11	Thu 7/7/11								
74	 Mechanically Eradicate Invasive Plants	2 days	Mon 8/15/11	Tue 8/16/11								
75	 Evaluation of Native Grass Germination	1 day	Wed 6/22/11	Wed 6/22/11								

Project: Metal Bank LTM Schedule 120110 Date: Mon 1/3/11		Task		Summary		External Milestone	
		Split		Project Summary		Deadline	
		Milestone		External Tasks		Progress	